

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF OKLAHOMA

FILED

JUN 09 2021

PATRICK KEANEY  
Clerk, U.S. District Court

By Deputy Clerk

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

AARON RICHARD EUBANKS,

*Defendant.*

Case No.

**CR 21-222 RAW**

INDICTMENT

The Federal Grand Jury charges:

COUNT ONE

**AGGRAVATED SEXUAL ABUSE IN INDIAN COUNTRY**  
[ 18 U.S.C. § 2241(c), 2246(2)(A), 1151 & 1153 ]

Beginning on or about February 1, 2020, and continuing until on or about February 10, 2021, within the Eastern District of Oklahoma, in Indian Country, the Defendant, **AARON RICHARD EUBANKS**, an Indian, did knowingly engage and attempt to engage in a sexual act as defined in Title 18, United States Code, Section 2246, to wit: penetration, however slight, between the penis and the vulva of L.A.E., who had not attained the age of 12 years, in violation of Title 18, United States Code, Sections 2241(c), 2246(2)(A), 1151 and 1153.

COUNT TWO

**AGGRAVATED SEXUAL ABUSE IN INDIAN COUNTRY**  
[ 18 U.S.C. § 2241(c), 2246(2)(C), 1151 & 1153 ]

Beginning on or about February 1, 2020, and continuing until on or about February 10, 2021, within the Eastern District of Oklahoma, in Indian Country, the Defendant, **AARON RICHARD EUBANKS**, an Indian, did knowingly engage and attempt to engage in a sexual act as defined in Title 18, United States Code, Section 2246, to wit: penetration, however slight,

between the finger and the genital opening of L.A.E., who had not attained the age of 12 years with an intent to abuse, humiliate, harass, degrade, arouse and gratify the sexual desire of any person in violation of Title 18, United States Code, Sections 2241(c), 2246(2)(C), 1151 and 1153.

**COUNT THREE**

**AGGRAVATED SEXUAL ABUSE IN INDIAN COUNTRY  
[ 18 U.S.C. § 2241(c), 2246(2)(B), 1151 & 1153 ]**

Beginning on or about February 1, 2020, and continuing until on or about February 10, 2021, within the Eastern District of Oklahoma, in Indian Country, the Defendant, **AARON RICHARD EUBANKS**, an Indian, did knowingly engage and attempt to engage in a sexual act as defined in Title 18, United States Code, Section 2246, to wit: contact between the mouth and the vulva of L.A.E., who had not attained the age of 12 years, in violation of Title 18, United States Code, Sections 2241(c), 2246(2)(B), 1151 and 1153.

**COUNT FOUR**

**AGGRAVATED SEXUAL ABUSE IN INDIAN COUNTRY  
[ 18 U.S.C. § 2241(c), 2246(2)(A), 1151 & 1153 ]**

Beginning on or about February 1, 2020, and continuing until on or about February 10, 2021, within the Eastern District of Oklahoma, in Indian Country, the Defendant, **AARON RICHARD EUBANKS**, an Indian, did knowingly engage and attempt to engage in a sexual act as defined in Title 18, United States Code, Section 2246, to wit: contact between the penis and the vulva of L.G.E., who had not attained the age of 12 years, in violation of Title 18, United States Code, Sections 2241(c), 2246(2)(A), 1151 and 1153.

**COUNT FIVE**


**AGGRAVATED SEXUAL ABUSE IN INDIAN COUNTRY  
[ 18 U.S.C. § 2241(c), 2246(2)(C), 1151 & 1153 ]**

Beginning on or about February 1, 2020, and continuing until on or about February 10,

2021, within the Eastern District of Oklahoma, in Indian Country, the Defendant, **AARON RICHARD EUBANKS**, an Indian, did knowingly engage and attempt to engage in a sexual act as defined in Title 18, United States Code, Section 2246, to wit: penetration, however slight, between the finger and the genital opening of L.G.E., who had not attained the age of 12 years, with an intent to abuse, humiliate, harass, degrade, arouse and gratify the sexual desire of any person in violation of Title 18, United States Code, Sections 2241(c), 2246(2)(C), 1151 and 1153.

A TRUE BILL:

CHRISTOPHER J. WILSON  
Acting United States Attorney

  
\_\_\_\_\_  
Gina S. Vann DCB #995348  
Assistant United States Attorney

Pursuant to the E-Government Act,  
the original indictment has been filed  
under seal in the Clerk's Office.

s / Foreperson  
**FOREPERSON OF THE GRAND JURY**